

Law Offices of
JAMES E. BAHAMONDE, P.C.

2501 Jody Court
North Bellmore, NY 11710
Long Island Tel. (516) 783-9662
New York City Tel. (646) 290-8258
Fax No. (646) 435-4376
James@CivilRightsNY.com

ECF FILED

August 17, 2015

Hon. Andrew L. Carter
Southern District of New York
40 Foley Sq.
New York, NY 10007

Re. *Hiraldo v. The New York and Presbyterian Hospital et al.*
S.D.N.Y. 15cv0530 (ALC)

Dear Judge Carter:

This office represents Plaintiff Pedro Hiraldo in the above-referenced action. We write with the consent of Defendants to provide the Court with a status report.

At the initial scheduling conference held on June 29, 2015, Defendants informed the Court that they had offered Mr. Hiraldo an alternative job with the same remuneration as his previous position. Plaintiff disputed Defendants' version of events but nevertheless welcomed the job offer. The Court then ordered the parties to submit a joint status report by July 27, 2015 regarding their efforts to place Mr. Hiraldo in a suitable position at The New York and Presbyterian Hospital.

On July 27, 2015, the parties submitted a joint-letter and requested additional time. The Court granted additional time and ordered parties to submit a status report by August 17, 2015.

Defendants offered Mr. Hiraldo a housekeeping position with the same salary and benefits as his earlier job, and on the same shift as his wife (pursuant to his request) in exchange for a general release and in lieu of continuing the litigation or any monetary relief. Plaintiff has declined Defendants offer because he also seeks equitable relief, monetary damages, and attorney's fees and costs. Regrettably, we advise the court parties were unable to reach an agreement.

Respectfully,

James E. Bahamonde

cc:

James S. Frank, Esq.
D. Martin Stanberry, Esq.